

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Roger Kornfeind dba Hydro Dynamic Pools LLC <u>Debtor(s)</u>	CHAPTER 13
BANK OF AMERICA, N.A. <u>Movant</u> vs.	NO. 19-17981 PMM
Roger Kornfeind dba Hydro Dynamic Pools LLC <u>Debtor(s)</u>	
Scott F. Waterman <u>Trustee</u>	11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. Movant is the holder of the Retail Installment Contract Simple Finance Charge (“Contract”) signed by Debtor
2. Movant is secured under the Contract by properly perfected first lien security interest in a U 2013 Audi S5, (“Vehicle”), bearing a VIN Number WAUGGAFR9DA050866.
3. As of January 13, 2021, the outstanding balance under the Contract is \$18,423.44.
4. In order to resolve Movant’s pending Motion for Relief, within fifteen (15) days, Debtor shall file the necessary motion(s) to Modify his Chapter 13 Plan to pay Movant’s total debt, plus 6% interest, directly through Debtor’s Plan over the life of the bankruptcy.
5. In the event Debtor fails to Modify his Plan as required under Section 4 above, the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting the Movant relief from the automatic stay.
6. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.

7. If the case is converted to Chapter 7, the Movant shall file a Certification of Default with the court and the court shall enter an order granting the Movant relief from the automatic stay.

8. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

9. The provisions of this stipulation do not constitute a waiver by the Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

10. The parties agree that a facsimile signature shall be considered an original signature.

Date: February 18, 2021

/s/ Rebecca A. Solarz, Esq.

Rebecca A. Solarz, Esq.
Attorney for Movant

Date: 2/22/2021



Zachary Zawarski, Esq.
Attorney for Debtor(s)

Date: 2/25/21



Scott F. Waterman, Esq.
Chapter 13 Trustee

Approved by the Court this _____ day of _____, 2021. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Patricia M. Mayer Judge